

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

JOHNNIE FLANAGAN, LAURA CHAPMAN
individually and on behalf of other persons
similarly situated,

Plaintiffs,

v.

PUBLIC PARTNERSHIPS LLC,

Defendant.

No. 6:25-cv-06225-FPG

**GENERAL ORDER NO. 157
DISCLOSURE STATEMENT
BY DEFENDANT
PUBLIC PARTNERSHIPS, LLC**

Undersigned counsel for Defendant Public Partnerships LLC certifies to the Court:

1. Plaintiffs assert at Paragraph 70 of their complaint (ECF No. 1) that this Court has subject matter jurisdiction pursuant to a number of sections of Title 8 [sic] of the United States Code, including Section 1332. Defendant assumes that Plaintiffs meant to reference Title 28 of the United States Code, and 28 U.S.C. § 1332, which provides a federal district court with jurisdiction over a case where the parties have diversity of citizenship of different states.

2. The reference by Plaintiffs to the Court's jurisdiction being based on diversity of citizenship under 28 U.S.C. § 1332 invokes General Order No. 157 of the United States District Court for the Western District of New York,¹ which in part orders:

[I]n an action in which the Court's subject matter jurisdiction is based on diversity of citizenship under 28 U.S.C. § 1332(a), a party or intervenor must file a disclosure statement that names and identifies the citizenship of every individual or entity whose citizenship is attributed to that party or intervenor.

3. Public Partnerships LLC is a privately held limited liability company organized under the laws of the State of Delaware, with its principal place of business located within the State of New York, at 17 Plaza Drive, Latham NY 12110. Defendant believes that it is a citizen

¹ *In the Matter of Disclosure of Members, Shareholders, Partners, and Leaders of Business Organization Parties*, United States District Court, Western District of New York, General Order No. 157, dated May 31, 2022.

of the State of Delaware, and a citizen of the State of New York by virtue of its having its principal place of business in New York, though Defendant acknowledges that the language of 28 U.S.C. § 1332(c)(1), which states that “a corporation shall be deemed to be a citizen of ... of the State or foreign state where it has its principal place of business” expressly references a corporation, and makes no mention of a limited liability company.

4. Public Partnerships LLC is a single-member limited liability company, with its single member being PPL Acquisition LLC, a limited liability company organized under the laws of Delaware. PPL Acquisition LLC is a non-operating company and therefore has no principal place of business. PPL Acquisition LLC appears to be a citizen of the State of Delaware.

5. The single member of PPL Acquisition LLC is PPL Intermediate Holdings Inc., a corporation organized under the laws of Delaware. PPL Intermediate Holdings Inc. is a non-operating company and therefore has no principal place of business. PPL Intermediate Holdings Inc. appears to be a citizen of the State of Delaware.

Dated: June 26, 2025



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Notice to All Parties of Record provided through ECF.